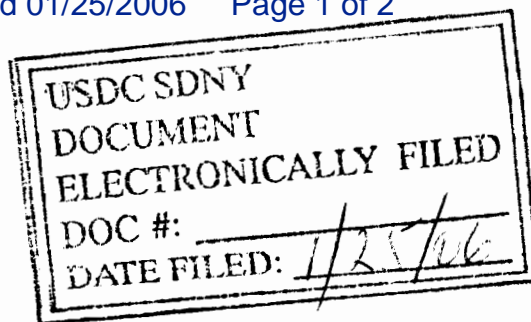


MEMO ENDORSED



MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

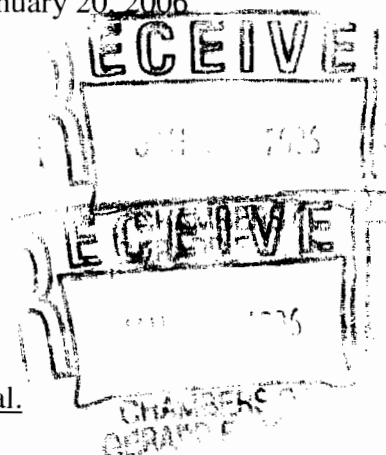
FRED M. WEILER
Special Federal Litigation Division
TEL: 212-788-1817
FAX: 212-788-9776

January 20, 2006

BY HAND

Honorable Gerald E. Lynch
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: Rechtschaffer v. City of New York, et al.
05 CV 9930 (GEL)



Dear Judge Lynch:

I am an assistant in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for Defendant City of New York (the "City"). I write with respect to the above-referenced matter, in which plaintiff sets forth constitutional claims relating to her alleged false arrest and unreasonable detention during the 2004 Republican National Convention.

The City's time to respond to the complaint will expire on or about January 30, 2006. With this letter, the City respectfully requests that its time to respond to the complaint be extended to and including March 27, 2006.¹ This request is made with the consent of plaintiff's counsel.

¹ In addition, plaintiff names several police officers as co-defendants. Without appearing or making any representations on their behalf, in the event that these officers were properly served, this office respectfully requests that the same extension be granted to them so that their defenses are not jeopardized while representation issues are being decided.

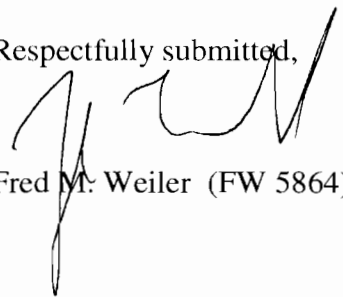
Hon. Gerald E. Lynch
January 20, 2006
Page 2

In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, this additional time is needed to investigate the allegations of the complaints. It is our understanding that the records of the underlying criminal action, including police records, may have been sealed pursuant to New York Criminal Procedure Law § 160.50. Therefore, this office has forwarded to plaintiff's counsel, for execution by plaintiff, a consent and authorization for the release of sealed records so that the City can access the information, properly assess the case, and respond to the complaint. It takes from 30 to 45 days after the consent is received for the subject records to be unsealed and released to this office.

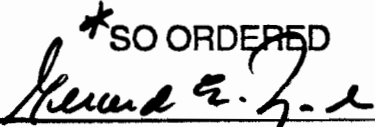
No previous request for an extension has been made by the City. Accordingly, it is respectfully requested that the City's time to answer or otherwise respond to the complaint in the above-referenced action be extended to and including March 27, 2006.

Thank you for your time and attention.

Respectfully submitted,


Fred M. Weiler (FW 5864)

cc: David Milton, Esq. (by mail)


*SO ORDERED
GERARD E. LYNCH, U.S.D.J.
1/24/06